

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

In re:	:	Chapter 11
	:	
Boy Scouts of America and Delaware	:	Case No. 20-10343 (LSS)
BSA, LLC <sup>1</sup>	:	
	:	
	:	Jointly Administered
Debtors.	:	
<hr/>		
National Union Fire Insurance Company of	:	
Pittsburgh, P.A., et al,	:	
	:	
	:	
Appellants,	:	
	:	
v.	:	Case No. 22-cv-01237-RGA
	:	
Boy Scouts of America, et al,	:	Jointly Consolidated <sup>2</sup>
	:	
	:	
Appellees.	:	

**MOTION AND ORDER FOR ADMISSION PRO HAC VICE**

Pursuant to Local Rule 83.5 and the attached Certification, counsel moves the admission *pro hac vice* of Mark D. Plevin, Esquire, Rachel A. Jankowski, Esquire, Tacie H. Yoon, and Kevin D. Cacabelos, Esquire of Crowell & Moring LLP to represent American Zurich Insurance Company, American Guarantee and Liability Insurance Company, and Steadfast Insurance Company in this matter.

TYBOUT, REDFEARN & PELL

/s/ Robert D. Cecil, Jr.

Robert D. Cecil, Jr., Esquire, #5317  
501 Carr Road, Suite 300  
P.O. Box 2092

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<sup>1</sup> The Debtors in these Chapter 11 cases, together with the last four digits of each Debtor's federal tax identification number, are as follows: Boy Scouts of America (6300) and Delaware BSA, LLC (4311). The Debtors' mailing address is 1325 West Walnut Hill Lane, Irving, Texas 75038.

<sup>2</sup> Case numbers 22-cv-01237; 22-cv-01238, 22-cv-01239, 22-cv-01240, 22-cv-01241, 22-cv-01242, 22-cv-01243, 22-cv-01244, 22-cv-01245, 22-cv-01246, 22-cv-01247, 22-cv-01249, 22-cv-01250, 22-cv-01251, 22-cv-01252, 22-cv-01258 and 22-cv-01263 have been jointly consolidated under 22-cv-01237.

Wilmington, DE 19899  
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[rcecil@trplaw.com](mailto:rcecil@trplaw.com)

*Attorneys for American Zurich Insurance  
Company, American Guarantee and  
Liability Insurance Company, and Steadfast  
Insurance Company*

**ORDER GRANTING MOTION**

IT IS HEREBY ORDERED, that counsel's Motion for Admission *Pro Hac Vice* of Mark D.  
Plevin, Esquire, Rachel A. Jankowski, Esquire, Tacie H. Yoon, Esquire, and Kevin D.  
Cacabelos, Esquire is GRANTED.

Date: \_\_\_\_\_

\_\_\_\_\_  
United States District Judge

**CERTIFICATION BY COUNSEL TO BE ADMITTED *PRO HAC VICE***

Pursuant to Local Rule 83.5, I, Mark D. Plevin, certify that I am eligible for admission to this Court, am admitted, and practicing in good standing as a member of the State Bar of California and the District of Columbia Bar, and pursuant to Local Rule 83.6, submit to the disciplinary jurisdiction of this Court for any alleged misconduct that occurs in the preparation or course of this action. I also certify that I am generally familiar with this Court's Local Rules. In accordance with Standing Order for District Court Fund effective September 1, 2016, I further certify that the annual fee of \$25.00 has been paid to the Clerk of the Court, or if not paid previously, the fee payment will be submitted to the clerk's office upon the filing of this motion.

*/s/ Mark D. Plevin*

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Mark D. Plevin, Esquire  
Crowell & Moring LLP  
Three Embarcadero Center, 26th Floor  
San Francisco, CA 94111  
(415) 986-2800  
mplevin@crowell.com

Dated: October 25, 2022

**CERTIFICATION BY COUNSEL TO BE ADMITTED *PRO HAC VICE***

Pursuant to Local Rule 83.5, I, Rachel A. Jankowski, certify that I am eligible for admission to this Court, am admitted and practicing in good standing as a member of the District of Columbia Bar and the State Bar of Illinois, and pursuant to Local Rule 83.6, submit to the disciplinary jurisdiction of this Court for any alleged misconduct that occurs in the preparation or course of this action. I also certify that I am generally familiar with this Court's Local Rules. In accordance with Standing Order for District Court Fund effective September 1, 2016, I further certify that the annual fee of \$25.00 has been paid to the Clerk of the Court, or if not paid previously, the fee payment will be submitted to the clerk's office upon the filing of this motion.

*/s/ Rachel A. Jankowski*

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Rachel A. Jankowski, Esquire  
Crowell & Moring LLP  
1001 Pennsylvania Avenue, N.W.  
Washington, DC 20004  
(202) 624-2500  
rjankowski@crowell.com

Dated: October 25, 2022

**CERTIFICATION BY COUNSEL TO BE ADMITTED PRO HAC VICE**

Pursuant to Local Rule 83.5, I, Tacie H. Yoon, certify that I am eligible for admission to this Court, am admitted and practicing in good standing as a member of the District of Columbia Bar, and pursuant to Local Rule 83.6, submit to the disciplinary jurisdiction of this Court for any alleged misconduct that occurs in the preparation or course of this action. I also certify that I am generally familiar with this Court's Local Rules. In accordance with Standing Order for District Court Fund effective September 1, 2016, I further certify that the annual fee of \$25.00 has been paid to the Clerk of the Court, or if not paid previously, the fee payment will be submitted to the clerk's office upon the filing of this motion.

*/s/ Tracie H. Yoon*

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Washington, DC 20004  
(202) 624-2500  
tyoon@crowell.com

Dated: October 25, 2022

**CERTIFICATION BY COUNSEL TO BE ADMITTED *PRO HAC VICE***

Pursuant to Local Rule 83.5, I, Kevin D. Cacabelos, certify that I am eligible for admission to this Court, am admitted and practicing in good standing as a member of the State Bar of California, and pursuant to Local Rule 83.6, submit to the disciplinary jurisdiction of this Court for any alleged misconduct that occurs in the preparation or course of this action. I also certify that I am generally familiar with this Court's Local Rules. In accordance with Standing Order for District Court Fund effective September 1, 2016, I further certify that the annual fee of \$25.00 has been paid to the Clerk of the Court, or if not paid previously, the fee payment will be submitted to the clerk's office upon the filing of this motion.

*/s/ Kevin D. Cacabelos*

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Dated: October 25, 2022